

**EXHIBIT  
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1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEW HAMPSHIRE  
3  
4 SECURITIES AND EXCHANGE ) Civil Action No.  
5 COMMISSION, ) 1:21-cv-00260-PB  
6 )  
7 Plaintiff, )  
8 ) VOLUME 1  
9 vs. ) (Pages 1 to 376)  
10 )  
11 LBRY, INC., )  
12 )  
13 Defendant. )  
14 )  
15 )  
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CONFIDENTIAL VIDEOTAPED DEPOSITION OF  
JEREMY KAUFFMAN  
New York, New York  
Monday, March 21, 2022

REPORTED BY:  
ELBIA BAIRES  
JOB NO. 220321LHR

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12:18 1 Q. Okay. More than one?

2 A. I don't -- I don't know. There's  
3 not -- there's not this large number of addresses  
4 out there. It -- with -- with large amounts in  
12:18 5 there. It's more you end up -- just due to the  
6 way that the software functions, you might end up  
7 with some address with like 40 LBC in it. And I'm  
8 not sure that something like that is getting  
9 listed.

12:18 10 But I -- I would guess that the  
11 addresses that are listed as ours contain well  
12 over 90 percent of our holdings.

13 Q. Because you said there are potentially  
14 more than a thousand wallet addresses associated  
12:18 15 with LBRY.

16 MR. MILLER: Objection.

17 A. Well, this is what it gets into, you  
18 can end up -- I mean, we are talking about an  
19 address space that is like incomprehensibly large  
12:19 20 in terms of the amount of addresses that -- that  
21 can exist.

22 And so you can end up with large  
23 amounts of addresses with really small amounts of  
24 LBC in them. And -- you know, you are not going  
12:19 25 to worry about listing an address that has .02 LBC

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12:19 1 in it or .002 or things like this.

2 Q. All right. So as far as you know,  
3 there's no way to figure out all of the addresses  
4 that have been associated with LBRY?

12:19 5 A. I think it is -- I think that you could  
6 do an analysis that would be close to correct.  
7 But it would be challenging to know that it was  
8 precisely correct. And you would have to make  
9 choices about what your definitions are in your --  
12:19 10 attempt to determine that. But I think you can do  
11 a pretty good job determining that.

12 Q. What choices would you have to make?

13 A. Well, once -- once -- once funds have  
14 been -- you know, I'm not -- I'm not certain. I'm  
12:20 15 not certain. It would be better to ask an expert.

16 Q. Okay. I understand.

17 Could you give me any insight into that  
18 or you don't know at all?

19 A. You know, it's basically you can sort  
12:20 20 of trace through. Because all of our addresses  
21 where the funds started from, that's all very  
22 public. As well as our attempts to label ones  
23 that continue to be ours, that's all very public.

24 And so can basically trace through and  
12:20 25 attempt to assess whether that activity is ours or